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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ARIEL OMAR LOPEZ-HERNANDEZ,  
aka "Ariel Lopez,"

Defendant

Case No. 2:23-mj-494-BNW

**Stipulation for an Order  
Directing Probation to Prepare  
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Edward G. Veronda, Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and Kimberly Sharkey, Assistant Federal Public Defender, counsel for Defendant ARIEL OMAR LOPEZ-HERNANDEZ, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has

1 extended to the defendant a plea offer in which the parties would agree to jointly request an  
2 expedited sentencing immediately after the defendant enters a guilty plea.

3 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal  
4 history until after the defendant enters his guilty plea unless the Court enters an order  
5 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of  
6 a defendant's initial appearance when charged by indictment.

7 3. The U.S. Probation Office informs the government that it would like to begin  
8 obtaining the criminal history of defendants eligible for the early disposition program as  
9 soon as possible after their initial appearance so that the Probation Office can complete the  
10 Presentence Investigation Report by the time of the expected expedited sentencing.

11 4. Accordingly, the parties request that the Court enter an order directing the  
12 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

13 DATED this 14<sup>th</sup> day of June, 2023.

14 Respectfully Submitted,

15 RENE L. VALLADARES  
16 Federal Public Defender

JASON M. FRIERSON  
United States Attorney

17 /s/ Kimberly Sharkey  
18 KIMBERLY SHARKEY  
19 Assistant Federal Public Defender  
20 Counsel for Defendant LOPEZ-  
21 HERNANDEZ  
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/s/ Edward G. Veronda  
EDWARD G. VERONDA  
Assistant United States Attorney

1                                   **UNITED STATES DISTRICT COURT**  
2                                   **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4                                   Plaintiff,

5                                   v.

6 ARIEL OMAR LOPEZ-HERNANDEZ,  
7                                   aka "Ariel Lopez,"

8                                   Defendant.  
9

Case No. 2:23-mj-494-BNW

**Order Directing Probation to  
Prepare a Criminal History Report**

10                   Based on the stipulation of counsel, good cause appearing, and the best interest of  
11 justice being served:

12                   IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a  
13 report detailing the defendant's criminal history.

14                   DATED this 15th day of June, 2023.

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18                                   UNITED STATES MAGISTRATE JUDGE  
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